

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 1:12-cr-435-S1
	§	
TOMAS YARRINGTON RUVALCABA	§	

**GOVERNMENT'S ORIGINAL  
NOTICE OF INTENT TO OFFER EXTRANEIOUS OFFENSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States Attorney for the Southern District of Texas, by and through the undersigned Assistant United States Attorney, and files this notice.

The Government may intend to use one or more of the following extraneous offenses in this trial to show motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident, as provided by Rule 404(b) of the Rules of Evidence:

Evidence of the defendant TOMAS YARRINGTON RUVALCABA'S flight from prosecution as evidence of guilt beginning from on or about May 2012 through his arrest in Italy on the Indictment on April 9, 2017.

Evidence of the defendant TOMAS YARRINGTON RUVALCABA'S use of a fraudulent YMCA identification card in the name of Tomas Chapa, attached to this notice as Exhibit A.

Evidence of the defendant TOMAS YARRINGTON RUVALCABA'S use of fraudulent/counterfeit identification documents at the time of his arrest in Italy on April 9, 2017. Further notice of the fraudulent identification document is attached to the notice as Exhibit A, which is a Mexican voter registration card and driver's license in the name of Jose Angel Marquez Perez.

The Government respectfully gives notice of the possible use of any of the above mentioned extraneous offenses. Additionally, the Government will approach the court before

questioning any witness in regards to these offenses.

Respectfully submitted,

RYAN K. PATRICK  
United States Attorney

By: /s/ Karen Betancourt  
**KAREN BETANCOURT**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2020, a copy of *Government's Notice to Intent to Offer Extraneous Offenses* was delivered to defense counsel for Tomas Yarrington Ruvalcaba, Chris Flood and Mervyn Mosbacker, via Notice of Electronic Filing.

/s/ Karen Betancourt  
**KAREN BETANCOURT**  
Assistant United States Attorney